

# **EXHIBIT C**

THE SCHER LAW FIRM, LLP

ONE OLD COUNTRY ROAD, SUITE 385  
CARLE PLACE, NY 11514

MARTIN H. SCHER\*  
JONATHAN L. SCHER\*  
\_\_\_\_\_  
AUSTIN R. GRAFF  
\_\_\_\_\_

TEL: 516-746-5040  
FAX #1: 516-746-5043  
FAX #2: 516-746-5105

W. SCOTT KERSHAW  
COUNSEL  
MICHAEL SCHILLINGER  
COUNSEL  
ROLAND P. BRINT  
COUNSEL

ROBERT S. NAYBERG  
(1959-2012)

\* Also Admitted in District of Columbia

November 17, 2021

**BY EMAIL TO:** [ServiceECF@law.nyc.gov](mailto:ServiceECF@law.nyc.gov)  
Meisha Porter, Chancellor  
New York City Department of Education  
65 Court Street  
Brooklyn, New York 11201

**BY EMAIL TO:** [bnorton@uft.org](mailto:bnorton@uft.org)  
Beth A. Norton, Esq.  
United Federation of Teachers  
52 Broadway  
New York, New York 10004

Re: Broecker *et al.*, and all others similarly situated v. NYCDOE, *et al.*  
E.D.N.Y. Index Number: UNKNOWN

To Whom It May Concern:

This law firm represents the Plaintiffs-NYCDOE employees who are entitled to charges and a hearing before any discipline can be imposed by the NYCDOE whose constitutional rights to their pay and due process have been violated by being suspended without pay because they did not take a COVID-19 vaccination.

Today, electronically, the Plaintiffs will be commencing an Action in the Eastern District of New York and filing an Order to Show Cause seeking, amongst other relief, a preliminary injunction against the New York City Department of Education reinstating the Plaintiffs and all others similarly situated to active payroll and restraining and enjoining the New York City Department of Education from unilaterally terminating any Plaintiff and all others similarly situated without process, including a stay of the December 1, 2021 arbitrary deadline to decide on an unpaid leave.

Be guided accordingly.

Very truly yours,  
THE SCHER LAW FIRM, LLP  
Austin Graff